

Exhibit B



April 29, 2005

Michael L. Koon

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Re: In Re Pharmaceutical Industry AWP Litigation

Dear Steve:

This will acknowledge and thank you for yours of April 20, 2005, concerning document discovery in the above-captioned case and enclosing a copy of a Rule 30(b)(6) deposition notice directed to my client, Aventis Pharmaceuticals.

We believe Aventis provided plaintiffs with the materials described in your letter some time ago. Specifically, our records reflect that we produced these data to designated liaison counsel for plaintiffs on July 1, 2004. Your letter to me appears to be very similar to those served on other Track 2 defendants on the same date. Based on this and our prior production, we understand your April 20th letter regarding Aventis' production should not be read as a claim that Aventis has failed to produce the described materials but, rather, as an effort by plaintiffs to make sure all Track 2 defendants have provided the requested data. Please advise promptly if we are in error in this regard.

With regard to the deposition notice, we understand that the May 6th date to be a control date. We will be unable to provide the requested 30(b)(6) representative on that date. In addition, we do not agree to provide such a witness in Seattle, Washington. Our client's headquarters facilities are located in New Jersey and we would suggest a deposition in Newark or New York City. Finally, based on your April 20th notice, the 45 day period within which defendants are to produce a witness in response thereto would expire on or about June 6th. Based on current commitments (including my son's planned wedding on June 11th) I would ask that you agree to extend Aventis' time to respond to the notice by producing a witness to June 30, 2005.

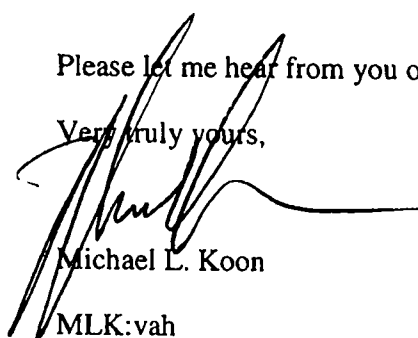
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Please let me hear from you on these matters at your earliest convenience. I remain

Very truly yours,



Michael L. Koon

MLK:vah

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